

**PROPOSED CONSOLIDATED PLAN  
PROGRAM YEAR 2015  
ACTION PLAN  
(JULY 1, 2015 THROUGH JUNE 30, 2016)**

**FOR  
HOUSING AND COMMUNITY DEVELOPMENT**

**PREPARED BY:**

**Shelby County Department of Housing  
1075 Mullins Station Road  
Memphis, TN 38134  
(901) 222-7600**

**MARK H. LUTTRELL, JR., MAYOR**  
JIM VAZQUEZ, DEPARTMENT ADMINISTRATOR



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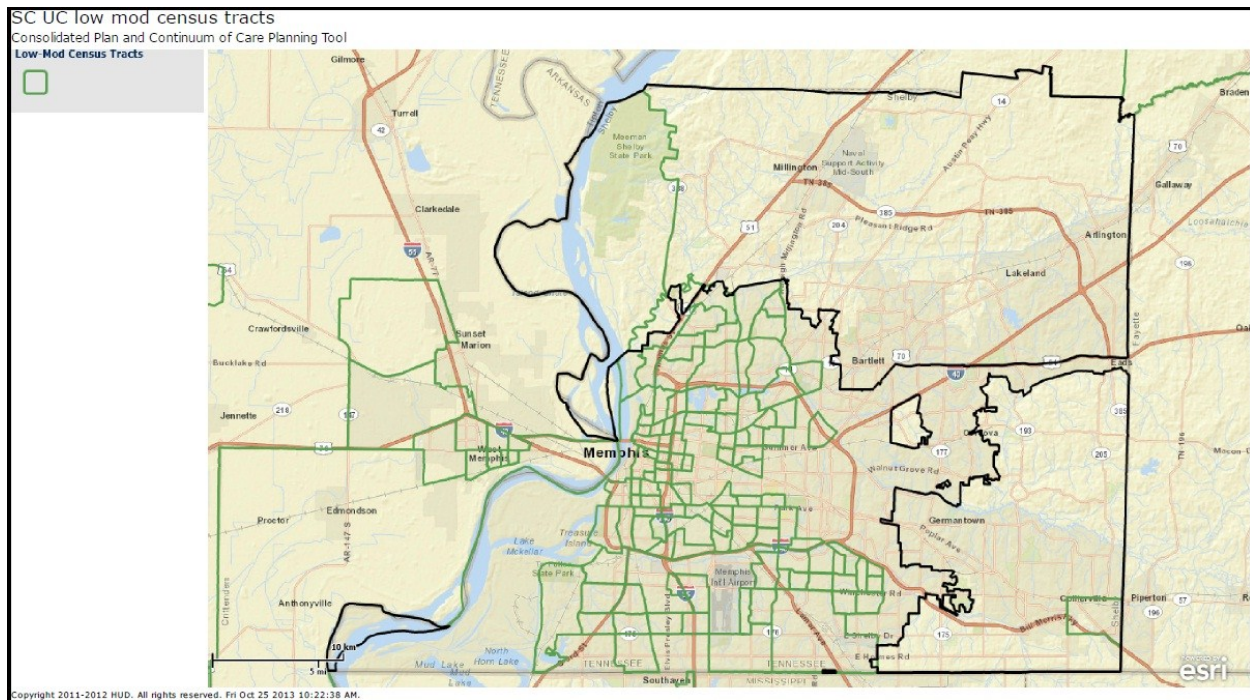
## **Executive Summary**

### **AP-05 Executive Summary - 24 CFR 91.200(c), 91.220(b)**

#### **1. Introduction**

This Annual Plan outlines the use of Program year 15 federal funds granted to Shelby County by the U.S. Department of Housing and Urban Development (HUD) under the Community Development Block Grant (CDBG) and Home Investment Partnership (HOME) programs. The Plan covers the period from July 1, 2015 through June 30, 2016 and marks the second year of Consolidated Plan 5-Year Strategy. Activities associated with the use of these funds are designated for the Shelby County Urban Entitlement Area including the municipalities of Arlington, Bartlett, Collierville, Germantown, Lakeland, and Millington as well as unincorporated areas of Shelby County. Programs and activities described in this plan are intended to primarily benefit low- and moderate-income residents of the Shelby County Urban Entitlement Area including areas with concentrations of low- and moderate-income residents. Shelby County will also use this plan as a basis for coordination with other federal, state, and local programs and initiatives.

The Shelby County Urban Entitlement Area is a diverse community composed of a mixture of suburban and rural development. The map below depicts the Shelby County Urban County Entitlement Area (outlined in bold black lines) as well as low- and moderate income census tracts in Shelby County.



## Shelby County Low- and Moderate Income Census Tracts

### 2. Summarize the objectives and outcomes identified in the Plan

This could be a restatement of items or a table listed elsewhere in the plan or a reference to another location. It may also contain any essential items from the housing and homeless needs assessment, the housing market analysis or the strategic plan.

High priority needs to be addressed in this Annual Plan include:

- Housing Choice, Rehabilitation, Modification, & Repair;
- Flood Drain Improvements; and
- Sidewalks.

### **3. Evaluation of past performance**

This is an evaluation of past performance that helped lead the grantee to choose its goals or projects.

SCDH has been a CDBG Urban Entitlement grantee since 1992 and a HOME participating jurisdiction since 1994. Since that time, SCDH has sought to expand its partnership base in order to utilize existing resources more efficiently and create greater impact for each HUD dollar spent in Shelby County. Since becoming a grantee, SCDH has inspected over 1,000 housing units, fully rehabilitated more than 800 homes, made more than 800 units lead safe, and completed more than 100 public facility and infrastructure projects. This record of successful accomplishment has been integral to exceeding program goals and benchmarks and has provided the capacity to implement the strategies necessary to address the high priority housing and community development needs described in this 5-Year Strategy.

### **4. Summary**

SCDH anticipates receiving \$1,076,137 in Program Year 15 CDBG funds and \$276,826 in Program Year 15 HOME funds to address high priority needs. By addressing these needs, SCDH will advance the goals to preserve the existing housing stock and create opportunities for affordable and fair housing, reduce the harmful affects of lead-based paint, and improve communities in Shelby County. During the second year of the 5-Year Strategy period, as described in the One Year Action Plan for the period of July 1, 2015 through June 30, 2016, SCDH will utilize these CDBG and HOME resources to accomplish the following:

1. Rehabilitation of 25 homes including 5 with accessibility modifications for residents with special needs,
2. Creation of 10 lead-safe housing units,
3. Acquisition of one unit to create an affordable housing opportunity, and
4. Implementation of 3 non-housing community development projects.

Additionally, at the time of the planning process for preparing this Annual Plan, CDBG Disaster Recovery projects from disasters in 2010 and 2011 were already underway and are expected to be completed during the program year.

## The Process

### PR-05 Lead & Responsible Agencies – 91.200(b)

#### 1. Agency/entity responsible for preparing/administering the Consolidated Plan

Describe the agency/entity responsible for preparing the Consolidated Plan and those responsible for administration of each grant program and funding source.

Agency Role	Name	Department/Agency
Lead Agency	SHELBY COUNTY	
CDBG Administrator	SHELBY COUNTY	Department of Housing
HOPWA Administrator		
HOME Administrator	SHELBY COUNTY	Department of Housing
HOPWA-C Administrator		

Table 1 – Responsible Agencies

#### Narrative (optional)

SCDH served as the lead agency responsible for preparing this Annual Plan and is also the major public agency responsible for administering all CDBG and HOME assisted programs covered by this Annual Plan. SCDH will be advised by the Urban County Consortium and will be under the direct authority of the Mayor of Shelby County, who will have final approval for all expenditures. The Urban County Consortium is composed of the Mayor of Shelby County and the Mayors of the six Entitlement Area municipalities (Arlington, Bartlett, Collierville, Germantown, Lakeland, and Millington), or their respective designee.

#### Consolidated Plan Public Contact Information

Jim Vazquez, Administrator  
Shelby County Department of Housing  
1075 Mullins Station Road  
Memphis, Tennessee 38134  
Telephone: (901) 222-7602  
Email: [jim.vazquez@shelbycountyttn.gov](mailto:jim.vazquez@shelbycountyttn.gov)

Scott Walkup, Planning Manager  
Shelby County Department of Housing  
1075 Mullins Station Road  
Memphis, Tennessee 38134  
Telephone: (901) 222-7610  
Email

## **Annual Plan**

## **AP-10 Consultation – 91.100, 91.200(b), 91.215(l)**

### **1. Introduction**

SCDH has taken steps to enhance coordination with public and assisted housing providers, providers of services for the nonhomeless having special needs, the Continuum of Care, and Urban County Consortium members.

#### **Provide a concise summary of the jurisdiction's activities to enhance coordination between public and assisted housing providers and private and governmental health, mental health and service agencies (91.215(l))**

SCDH coordinated with all municipalities in the Urban County Consortium (Arlington, Bartlett, Collierville, Germantown, Lakeland, and Millington) in preparing the 5 Year Strategy. SCDH relied upon information and input from a wide range of housing providers and health/mental health agencies, especially for drafting the needs assessment, including The Community Alliance for the Homeless, The City of Memphis Division of Housing and Community Development, the Plough Foundation, the Memphis Mental Health Institute, and the Shelby County Health Department Ryan White Program.

#### **Describe coordination with the Continuum of Care and efforts to address the needs of homeless persons (particularly chronically homeless individuals and families, families with children, veterans, and unaccompanied youth) and persons at risk of homelessness.**

Information provided by the Community Alliance for the Homeless was used for the homeless special needs section of the Needs Assessment, and the Alliance was asked to review and comment on the initial draft of this section in the Needs Assessment.

#### **Describe consultation with the Continuum(s) of Care that serves the jurisdiction's area in determining how to allocate ESG funds, develop performance standards for and evaluate outcomes of projects and activities assisted by ESG funds, and develop funding, policies and procedures for the operation and administration of HMIS**

Shelby County is not a recipient of ESG funds and therefore did not consult with the Continuum(s) of Care to determine how to allocate ESG funds, determine performance standards and evaluate outcomes, and develop funding, policies and procedures for the administration of HMIS.

#### **Narrative (optional)**

Coordination with local units of government, particularly the six municipal members of the Urban County Consortium, are detailed in the above table of organizations consulted.

## Expected Resources

### AP-15 Expected Resources – 91.220(c) (1, 2)

#### Introduction

On February 10, 2015, HUD announced Program Year 2015 formula allocation amounts for CDBG and HOME grantees. The anticipated resources for the Program Year described in this section are based upon those amounts. Based upon the February 10, 2015 announcement, SCDH anticipates receiving \$1,076,137 in CDBG funds and \$276,826 in HOME funds. Additionally, as described in the 5-Year Strategy, SCDH proposes applying all CDBG program income received during the Program Year toward the Housing Rehabilitation program and/or Minor Home Repair Programs.

#### Priority Table

Program	Source of Funds	Uses of Funds	Expected Amount Available Year 1				Expected Amount Available Reminder of ConPlan \$	Narrative Description
			Annual Allocation: \$	Program Income: \$	Prior Year Resources: \$	Total: \$		
CDBG	public - federal	Acquisition Admin and Planning Economic Development Housing Public Improvements Public Services	1,076,137	10,000	0	1,086,137	3,223,000	Expected remaining resources are based upon generally level funding from Program Year 2013 (as described in the 5-year Strategy).

Program	Source of Funds	Uses of Funds	Expected Amount Available Year 1				Expected Amount Available Reminder of ConPlan \$	Narrative Description
			Annual Allocation: \$	Program Income: \$	Prior Year Resources: \$	Total: \$		
HOME	public - federal	Acquisition Homebuyer assistance Homeowner rehab Multifamily rental new construction Multifamily rental rehab New construction for ownership TBRA	276,826	15,000	0	291,826	895,000	Expected remaining resources are based upon generally level funding from Program Year 2013 (as described in the 5-year Strategy).

**Table 2 - Expected Resources – Priority Table**

**Explain how federal funds will leverage those additional resources (private, state and local funds), including a description of how matching requirements will be satisfied**

Federal funds will leverage additional resources including approximately \$75,000 in private funds through nonprofit CHDO developers receiving the HOME CHDO set-aside funds and approximately \$63,000 in local funds to meet HOME matching requirements.

**If appropriate, describe publically owned land or property located within the jurisdiction that may be used to address the needs identified in the plan**

It is not anticipated that publically owned land or property located within the jurisdiction that may be used to address the needs identified in the plan.

**Discussion**

Since these anticipated resources are based upon the February 10, 2015 HUD announcement of Program year 2015 allocations, it is not anticipated that these resources will change during the term of this Annual Plan.

## Annual Goals and Objectives

### AP-20 Annual Goals and Objectives - 91.420, 91.220(c)(3)&(e)

#### Goals Summary Information

Sort Order	Goal Name	Start Year	End Year	Category	Geographic Area	Needs Addressed	Funding	Goal Outcome Indicator
<b>1</b>	Preserve & create housing affordability & choice	2014	2018	Affordable Housing Non-Homeless Special Needs Fair Housing	Shelby County Urban County Entitlement Area	Housing Rehab, Modification, Repair, & Choice	CDBG: \$448,129 HOME: \$327,144	Public service activities for Low/Moderate Income Housing Benefit: 90 Households Assisted Homeowner Housing Rehabilitated: 25 Household Housing Unit Other: 1 Other
<b>2</b>	Reduce the harmful affects of lead-based paint	2014	2018	Lead-Safe Housing for Families with Children under 6 Years of Age	Shelby County, Tennessee	Housing Rehab, Modification, Repair, & Choice	CDBG: \$100,000 HOME: \$0	Other: 10 Other
<b>3</b>	Improve communities	2014	2018	Non-Housing Community Development	Shelby County Urban County Entitlement Area	Flood Drain Improvements Sidewalks	CDBG: \$175,000 HOME: \$0	Public Facility or Infrastructure Activities for Low/Moderate Income Housing Benefit: 1259 Households Assisted Other: 1 Other

**Table 3 – Goals Summary**

## Goal Descriptions

1	Goal Name	Preserve & create housing affordability & choice
	Goal Description	This goal will be accomplished through housing rehabilitation and utilizing the CHDO set aside funds to create affordable housing.
2	Goal Name	Reduce the harmful affects of lead-based paint
	Goal Description	Reduce the harmful affects of lead-based paint.
3	Goal Name	Improve communities
	Goal Description	This goal will be accomplished through infrastructure, public facilities and floodway buyout projects.

Table 4 – Goal Descriptions

**Estimate the number of extremely low-income, low-income, and moderate-income families to whom the jurisdiction will provide affordable housing as defined by HOME 91.215(b):**

During Program Year 2015, Shelby County estimates that affordable housing will be provided to one (1) extremely low-income, low-income, or moderate-income family in partnership with a nonprofit developer receiving HOME CHDO seat-aside funds.

## **AP-35 Projects – 91.220(d)**

### **Introduction**

Allocation priorities are a product of the Consolidated Plan citizen participation process as well as consultation with the Urban County Consortium throughout the Consolidated Plan planning process.

#	Project Name
1	Housing Rehabilitation and Minor Home Repair
7	Program Delivery
8	Administration and Planning

**Table 5 – Project Information**

### **Describe the reasons for allocation priorities and any obstacles to addressing underserved needs**

Allocation priorities were based upon needs identified through the Consolidated Plan citizen participation process as well as from the guidance and input of the Urban County Consortium throughout the Consolidated Plan planning process. Obstacles to address underserved needs identified in the planning process are primarily a function of limited resources.

## Projects

### AP-38 Projects Summary

#### Project Summary Information

Table 6 – Project Summary

1	<b>Project Name</b>	Housing Rehabilitation and Minor Home Repair
	<b>Target Area</b>	Shelby County Urban County Entitlement Area Shelby County, Tennessee
	<b>Goals Supported</b>	Preserve & create housing affordability & choice Reduce the harmful affects of lead-based paint Improve communities
	<b>Needs Addressed</b>	Housing Rehab, Modification, Repair, & Choice
	<b>Funding</b>	CDBG: \$448,129 HOME: \$222,620
	<b>Description</b>	Scattered site housing rehabilitation and minor home repair.
	<b>Target Date</b>	6/30/2016
	<b>Estimate the number and type of families that will benefit from the proposed activities</b>	35 low- and-moderate income owner-occupied homes including some elderly households and some households with children less than 6 years of age.
	<b>Location Description</b>	To be determined based upon client intake/enrollment.
	<b>Planned Activities</b>	Rehabilitation of owner-occupied to bring homes into code compliance and minor home repair to produce lead safe housing for families/households with children less than six years of age.
2	<b>Project Name</b>	CHDO Affordable Housing Development
	<b>Target Area</b>	Shelby County Urban County Entitlement Area

	<b>Goals Supported</b>	Preserve & create housing affordability & choice
	<b>Needs Addressed</b>	Housing Rehab, Modification, Repair, & Choice
	<b>Funding</b>	HOME: \$41,524
	<b>Description</b>	Development of affordable housing by a CHDO using HOME CHDO set-aside funds.
	<b>Target Date</b>	6/30/2016
	<b>Estimate the number and type of families that will benefit from the proposed activities</b>	One low/moderate income homebuyer is expected to benefit from this activity.
	<b>Location Description</b>	To be determined.
	<b>Planned Activities</b>	Acquisition and rehabilitation of a vacant housing unit to create and affordable housing unit for sale to a qualifying low/moderate income homebuyer.
<b>3</b>	<b>Project Name</b>	Fair Housing - Public Services
	<b>Target Area</b>	Shelby County Urban County Entitlement Area
	<b>Goals Supported</b>	Preserve & create housing affordability & choice
	<b>Needs Addressed</b>	Housing Rehab, Modification, Repair, & Choice
	<b>Funding</b>	CDBG: \$50,000
	<b>Description</b>	Fair housing outreach in partnership with Memphis Area Legal Services.
	<b>Target Date</b>	6/30/2016
	<b>Estimate the number and type of families that will benefit from the proposed activities</b>	Through the Fair Housing Center and Memphis Area Legal Services, SCDH expects to provide housing and fair housing services for 90 residents of Shelby County.
	<b>Location Description</b>	This is a Public Service activity and is not associated with a specific location.

	<b>Planned Activities</b>	<p>The Fair Housing Center will document the nature and resolution of calls, make appropriate referrals, maintain demographic data, provide or refer clients to court representation, provide community education and outreach, and assist clients in resolving housing issues. A total of 90 Shelby County residents will be screened and/or served by this Project. Education and outreach will include 2 (two) seminars and/or group presentations on housing and fair housing issues. MFHC will also assist the County in addressing the barriers identified in the County's Analysis of Impediments to Fair Housing (AI).</p> <p>Complaints of alleged housing discrimination received from any source will be investigated and demographic data will be compiled concerning the facts surrounding the complaint, including the name of complainant, date of the complaint, nature of the problem, staff person(s) handling the complaint, the ethnic background of each client, the date the case is closed, and the resolution of the complaint.</p> <p>MFHC will screen housing complaints, accept housing complaints for investigation, and provide legal representation in cases involving the Fair Housing Act, The Uniform Landlord Tenant Act of Tennessee, The Housing Voucher Program, Tax Sales of Real Property, housing code violations and other issues related to equal housing opportunities. Additionally, MFHC will determine whether the complaint involves a fair housing violation. If the complaint is determined to be a possible violation of the fair housing laws, MFHC will investigate and enforce the fair housing laws.</p> <p>Testing and other methods will be used to investigate systemic housing discrimination or individual discrimination complaints. MFHC will use the procedure as set forth in the John Marshall Law School Tester Training Manual for recruiting and training prospective testers. A file will be maintained on the training of testers, on each tester trained and on all tester visits. No staff members, their immediate family members, or any persons involved with a fair housing complaint will be used as testers.</p> <p>MFHC will also assist the County in addressing the barriers identified in the County's Analysis of Impediments to Fair Housing (AI).</p>
4	<b>Project Name</b>	Bartlett Floodway Property Buyout
	<b>Target Area</b>	Shelby County Urban County Entitlement Area

	<b>Goals Supported</b>	Improve communities
	<b>Needs Addressed</b>	Flood Drain Improvements
	<b>Funding</b>	CDBG: \$22,000
	<b>Description</b>	Buyout of flood damaged housing in a floodway.
	<b>Target Date</b>	6/30/2016
	<b>Estimate the number and type of families that will benefit from the proposed activities</b>	One low/mod homebuyer will benefit from this project.
	<b>Location Description</b>	2810 Alfaree Road, Bartlett, TN
	<b>Planned Activities</b>	Funds to be provided as local match for FEMA buyout request.
5	<b>Project Name</b>	Lamb Road Sidewalk Installation
	<b>Target Area</b>	Shelby County Urban County Entitlement Area
	<b>Goals Supported</b>	Improve communities
	<b>Needs Addressed</b>	Sidewalks
	<b>Funding</b>	CDBG: \$80,000
	<b>Description</b>	Add curb, gutter and sidewalk on the west side of Lamb Road from Hughes Road to Highway 70 in Arlington, TN.
	<b>Target Date</b>	6/30/2016
	<b>Estimate the number and type of families that will benefit from the proposed activities</b>	It is estimated that 30 families in 30 single-family dwelling units will benefit from the proposed project.
	<b>Location Description</b>	West side of Lamb Road from Hughes Road to Highway 70 in Arlington, TN.

	<b>Planned Activities</b>	Installation of curb, gutter and sidewalk.
<b>6</b>	<b>Project Name</b>	Mill Street Outfall Improvements
	<b>Target Area</b>	Shelby County Urban County Entitlement Area
	<b>Goals Supported</b>	Improve communities
	<b>Needs Addressed</b>	Flood Drain Improvements
	<b>Funding</b>	CDBG: \$95,000
	<b>Description</b>	Improvements to an undersized and deteriorated concrete bottomed open ditch.
	<b>Target Date</b>	6/30/2016
	<b>Estimate the number and type of families that will benefit from the proposed activities</b>	It is estimated that 1,258 families in 1,258 dwelling units will benefit from the proposed project.
	<b>Location Description</b>	Existing ditch roughly between Mills Street and Center Street in Collierville, Tennessee.
	<b>Planned Activities</b>	Ditch improvements.
<b>7</b>	<b>Project Name</b>	Program Delivery
	<b>Target Area</b>	Shelby County Urban County Entitlement Area Shelby County, Tennessee
	<b>Goals Supported</b>	Preserve & create housing affordability & choice Reduce the harmful affects of lead-based paint Improve communities
	<b>Needs Addressed</b>	Housing Rehab, Modification, Repair, & Choice Flood Drain Improvements Sidewalks
	<b>Funding</b>	CDBG: \$173,781

	<b>Description</b>	Implementation of CDBG programs.
	<b>Target Date</b>	6/30/2016
	<b>Estimate the number and type of families that will benefit from the proposed activities</b>	Not applicable.
	<b>Location Description</b>	Not applicable.
	<b>Planned Activities</b>	Not applicable.
8	<b>Project Name</b>	Administration and Planning
	<b>Target Area</b>	Shelby County Urban County Entitlement Area Shelby County, Tennessee
	<b>Goals Supported</b>	Preserve & create housing affordability & choice Reduce the harmful affects of lead-based paint Improve communities
	<b>Needs Addressed</b>	Housing Rehab, Modification, Repair, & Choice Flood Drain Improvements Sidewalks
	<b>Funding</b>	CDBG: \$217,227 HOME: \$27,682
	<b>Description</b>	General administrative and planning activities necessary to operate HOME and CDBG programs.
	<b>Target Date</b>	
	<b>Estimate the number and type of families that will benefit from the proposed activities</b>	Not Applicable.
	<b>Location Description</b>	Not Applicable.

## **AP-50 Geographic Distribution – 91.220(f)**

### **Description of the geographic areas of the entitlement (including areas of low-income and minority concentration) where assistance will be directed**

There are seven municipalities in Shelby County including Arlington, Bartlett, Collierville, Germantown, Memphis, Millington, and Lakeland. The Shelby County Urban Entitlement includes unincorporated Shelby County and all of these municipalities except Memphis.

#### **Geographic Distribution**

<b>Target Area</b>	<b>Percentage of Funds</b>
Shelby County Urban County Entitlement Area	93
Shelby County, Tennessee	7

**Table 7 - Geographic Distribution**

### **Rationale for the priorities for allocating investments geographically**

SCDH does not propose emphasizing target areas or strategy areas as part of this Strategic Plan. This is primarily because concentrations of low- and moderate-income areas in the jurisdiction are limited, low- and moderate-income area and households are spread throughout the jurisdiction, and assistance is allocated based upon population data from each of the 6 municipalities within the jurisdiction. The Shelby County Urban Entitlement Area is a diverse community including a mixture of suburban and rural development. Fair Housing activities and Minor Home Repair in support of the Lead Hazard Control Grant will be conducted on a county-wide basis. It is estimated that no more than 15% of funds will be used on a county-wide basis.

### **Discussion**

Housing services offered in accordance with this Strategic Plan will be made available on a county- or jurisdiction-wide basis. Non-housing community development activities are rotated among the urban county consortium members as resources permit and in accordance with the Strategic Plan to provide benefits in low- and moderate-income areas or direct benefit to low- and-moderate income clients as applicable.

## Affordable Housing

### AP-55 Affordable Housing – 91.220(g)

#### Introduction

SCDH has a one year affordable housing goal to assist 35 households through rehabilitation including 25 complete housing rehabilitation projects in the Urban County and 10 units receiving minor home repair to address lead-based paint hazards. Additionally, as part of the 25 complete housing rehabilitation projects in the Urban County, SCDH has established an associated and linked one year affordable housing goal that 5 of these households will be non-homeless special needs households.

SCDH has also established a one year affordable housing goal to acquire one existing housing unit using CHDO set aside funds. It is anticipated that awarded CHDO funds beyond the cost of acquisition may be applied to eligible rehabilitation costs associated with the acquired unit.

One Year Goals for the Number of Households to be Supported	
Homeless	0
Non-Homeless	25
Special-Needs	5
Total	30

**Table 8 - One Year Goals for Affordable Housing by Support Requirement**

One Year Goals for the Number of Households Supported Through	
Rental Assistance	0
The Production of New Units	0
Rehab of Existing Units	35
Acquisition of Existing Units	1
Total	36

**Table 9 - One Year Goals for Affordable Housing by Support Type**

#### Discussion

SCDH's one year affordable housing goals will be carried out through housing rehabilitation and minor home repair as well as through HOME CHDO set aside funds. Since SCDH is not a recipient of Continuum of Care funds, resources to directly support the homeless are unavailable.

## **AP-60 Public Housing – 91.220(h)**

### **Introduction**

The Millington Housing Authority requires little assistance from the SCDH. Kefauver Estates, the remaining public housing facility in the Urban County, is operated by the Memphis Housing Authority. SCDH will continue to assist both housing authorities as needed to ensure that its needs are met and the goal of providing safe, decent, and affordable housing for its residents is obtained.

### **Actions planned during the next year to address the needs to public housing**

In Program Year 2015, The Shelby County Department of Housing will continue its efforts to serve the needs of extremely low-income, low-income, and moderate-income families residing in the jurisdiction served by the Millington Housing Authority.

### **Actions to encourage public housing residents to become more involved in management and participate in homeownership**

Memphis Housing Authority has a Resident Advisory Board (RAB) established to provide activities and advocate for the rights of residents. The Memphis Housing Authority RAB is also responsible for assisting with and commenting on Memphis Housing Authority's 5 -Year Planning process. The Millington Housing Authority also has a Resident Advisory Board that meets annually. Additionally, MillHA publishes a newsletter to engage and inform residents.

As for homeownership, SCDH plans to continue implementing a homebuyer downpayment assistance program during the program year. This program could benefit qualified public housing residents seeking to own their own home. This program is funded using state and local funds. MillHA indicated it does not have plans to encourage public housing residents to participate in homeownership.

### **If the PHA is designated as troubled, describe the manner in which financial assistance will be provided or other assistance**

Neither PHA is designated as troubled.

### **Discussion**

Both public housing authority operations located within the Urban County Entitlement Area are small and rely upon Resident Advisory Boards to encourage resident involvement in management. Neither is designated as troubled.

## **AP-65 Homeless and Other Special Needs Activities – 91.220(i)**

### **Introduction**

Shelby County is not a recipient of ESG grant funds and has not established one-year goals to utilize CDBG or HOME funds directly for homeless reduction activities. Activities to address these issues are coordinated with the City of Memphis and the Community Alliance for the Homeless.

### **Describe the jurisdictions one-year goals and actions for reducing and ending homelessness including**

#### **Reaching out to homeless persons (especially unsheltered persons) and assessing their individual needs**

The community's outreach and engagement approach includes a phone-based hotline, two walk-in centers, and roving street outreach presence. For families with children, there is a centralized intake that screens, on average 500 families per month and a phone-based hotline receives 1,800 calls/month. Through implementation of the 100,000 Homes/Memphis100 initiative, a street outreach team meets weekly to discuss and prioritize the vulnerable unsheltered individuals in the community. This has brought to light the importance of street outreach and the need to enhance funding for outreach and engagement activities. Memphis is also establishing an electronic assessment and referral tool to maximize existing resources and make it easier for people experiencing homelessness to seek help.

#### **Addressing the emergency shelter and transitional housing needs of homeless persons**

Memphis has identified the need for free/no fee emergency shelter especially for single women and intends to convert existing transitional housing programs to rapid rehousing or permanent supportive housing. Memphis will maintain and target remaining transitional housing programs for populations most likely to leave homelessness through this intervention and who will not qualify for permanent supportive housing.

#### **Helping homeless persons (especially chronically homeless individuals and families, families with children, veterans and their families, and unaccompanied youth) make the transition to permanent housing and independent living, including shortening the period of time that individuals and families experience homelessness, facilitating access for homeless individuals and families to affordable housing units, and preventing individuals and families who were recently homeless from becoming homeless again**

For chronically homeless individuals and families, the Memphis Mayors' Action Plan calls for an additional units of permanent supportive housing. Many of the units added so far are designated for chronically homeless veterans.

**Helping low-income individuals and families avoid becoming homeless, especially extremely low-income individuals and families and those who are: being discharged from publicly funded institutions and systems of care (such as health care facilities, mental health facilities, foster care and other youth facilities, and corrections programs and institutions); or, receiving assistance from public or private agencies that address housing, health, social services, employment, education, or youth needs.**

The City of Memphis Emergency Housing Partnership serves households with homeless prevention assistance in the upcoming year through the Emergency Solutions Grant program. MIFA’s central assessment process helps mediate with more than three thousand families each year who avoid homelessness as a result. Partnerships with the public institutions including foster care, corrections, and hospitals continue to improve. Funding and a non-profit sponsor that could provide respite care to those who are homeless and have had or are awaiting surgery or other medical procedures that make it unsafe for them to discharge to homelessness has been identified as a strategy to pursue. Memphis has a Housing First Assertive Community Treatment team that provides intensive, integrated treatment for dually diagnosed chronically homeless individuals who reside in permanent housing. This team, supervised by Comprehensive Counseling Network includes mental health professionals, physical health professionals, case managers, and peer support specialists. They are poised to serve individuals who are housed by one of eight permanent supportive housing providers. The services people leaving institutions are expected to need are housing, community based mental health counseling and treatment, physical health care, employment services, substance abuse counseling and treatment, disability benefit application assistance, and legal advocacy/services.

## Discussion

Since Shelby County is not a recipient of ESG grant funds, it has insufficient resources for direct expenditures to carry out homeless reduction activities. Efforts to address these issues are coordinated with the City of Memphis and the Community Alliance for the Homeless.

<b>One year goals for the number of households to be provided housing through the use of HOPWA for:</b>
Short-term rent, mortgage, and utility assistance to prevent homelessness of the individual or family
Tenant-based rental assistance
Units provided in housing facilities (transitional or permanent) that are being developed, leased, or operated
Units provided in transitional short-term housing facilities developed, leased, or operated with HOPWA funds
Total

## **AP-75 Barriers to affordable housing – 91.220(j)**

### **Introduction**

Based on the 2011 Shelby County Analysis of Impediments to Fair Housing, the following are public policy related barriers to affordable housing:

Land Acquisition Costs. High cost makes affordable housing development in the urban county very difficult, if not impossible.

Tax Rates for Rental Housing Make It Difficult to Provide Decent, Affordable Housing. The tax rate for multi-family rental housing is substantially higher than the rate for single-family housing.

Lack of other resources and incentives to develop affordable housing in the consortium area. There are little or no other governmental or philanthropic resources or incentives for affordable housing development within urban county.

**Actions it planned to remove or ameliorate the negative effects of public policies that serve as barriers to affordable housing such as land use controls, tax policies affecting land, zoning ordinances, building codes, fees and charges, growth limitations, and policies affecting the return on residential investment**

Land Acquisition Costs. SCDH anticipates using HOME CHDO funds to assist nonprofit affordable housing developers with costs, including acquisition costs, necessary to create affordable housing opportunities.

Tax Rates for Rental Housing Make It Difficult to Provide Decent, Affordable Housing. SCDH intends to coordinate efforts with THDA to make information available about Tax Credits, their use in Shelby County and other State programs available at the local level, including outreach workshops to provide direct information on both state and local initiatives.

Lack of other resources and incentives to develop affordable housing in the consortium area. SCDH intends to leverage nonfederal resources, (e.g. state and local funds for downpayment assistance) to meet affordable housing needs. SCDH also intends to continue assisting philanthropic efforts to meet the housing needs of low-income and special needs groups (e.g. the Plough Foundation's Aging in Place Initiative).

### **Discussion**

Barriers to affordable housing coincide with many impediments to fair housing, as protected classes often are low-income and face disparate impacts by virtue of income as well as race or other protected

class. As a result, the identified barriers to affordable housing mirror some of the impediments to fair housing.

## **AP-85 Other Actions – 91.220(k)**

### **Introduction**

Shelby County plans other actions during the Program year including actions to address obstacles to meeting underserved needs, to foster and maintain affordable housing, to reduce lead-based paint hazards, to reduce the number of poverty-level families, to develop institutional structure, and to enhance coordination between public and private housing and social service agencies.

### **Actions planned to address obstacles to meeting underserved needs**

SCDH will continue to work with and coordinate activities with the Shelby County Community Services Agency (CSA) in their efforts to meet the underserved needs in the Shelby County Urban County Entitlement Area. CSA offers various programs targeting individuals and families with low- to moderate-incomes such as rent/mortgage assistance, utility assistance, and referrals for the homeless population. CSA historically ran the County's Weatherization Assistance Program. However, at the time of the planning process for this PY15 Annual Action Plan, the Weatherization Assistance Program was being transitioned from CSA to the SCDH with implementation expected to begin by the end of the 2015 calendar year.

Additionally, SCDH will provide referrals as necessary to the Aging Commission of the Mid-South. The Aging Commission provides assistance to the senior population of Shelby County through programs including Alzheimer's service, home care, legal assistance, long term care ombudsman services, nutrition services, public guardianship, and transportation.

Finally, the SCDH plans to coordinate with the Plough Foundation's Aging Initiative Bringing awareness to the comprehensive needs of the older citizens of our community needs to be a strategic priority because of its profound impact on our society.

### **Actions planned to foster and maintain affordable housing**

maintaining affordable housing. The two goals emphasizing fostering and maintaining affordable housing are:

- Preserve the existing housing stock and create opportunities for affordable housing, and
- Reduce the harmful affects of lead-based paint.

These goals will be accomplished through the rehabilitation of housing in the Urban County and addressing lead-based paint hazards (including repairs to address deteriorated painted surfaces) in eligible homes in Shelby County having children less than 6 years of age.

### **Actions planned to reduce lead-based paint hazards**

During the program year, SCDH will continue to operate the Lead Hazard Control Program funded in part by a Lead Hazard Control Grant through the HUD Office of Healthy Homes and Lead hazard Control. Furthermore, through the Housing Rehabilitation Program, SCDH will continue to complete lead-based paint risk assessments on all target housing with rehabilitation work being completed in accordance with the HUD Lead Safe Housing Rule. Finally, SCDH will require any housing rehabilitation conducted using HOME CHDO set-aside funds to comply with the HUD Lead Safe Housing Rule as well.

### **Actions planned to reduce the number of poverty-level families**

SCDH plans to provide supplemental assistance in the form of housing rehabilitation, minor home repair and lead-based paint hazard controls to reduce housing costs among low- and moderate-income households, including the impoverished. SCDH plans to provide supplemental assistance in the form of housing rehabilitation, minor home repair and lead-based paint hazard controls to reduce housing costs among low- and moderate-income households, including the impoverished.

Additionally, the primary aim of Shelby County Government's Community Services Agency (CSA) is breaking the generational cycle of poverty requires changes in attitude, living conditions, education, and aspirations of its victims.

Working with nonprofit organizations, other branches of government, other governmental agencies, and citizen committees, the agency plans and carries out programs for low-income residents. These programs emphasize self-help.

CSA has served about 1,650 households assisting with cooling their homes in summer, and assists another 13,000 households with heating their homes in the winter. The county's weatherization program is for low-income persons. The weatherization program provides free minor home repairs, such as fixing broken windowpanes and rotted windowsills, which lower energy costs. at the time of the planning process for this PY15 Annual Action Plan, the Weatherization Assistance Program was being transitioned from CSA to the SCDH with implementation expected to begin by the end of the 2015 calendar year.

### **Actions planned to develop institutional structure**

As the primary organization responsible for the administration of funds, implementation of projects and programs, and the expenditure of all grant allocations, SCDH will coordinate efforts and activities within the Urban County community. This coordination will involve the administration and delivery of all CDBG and HOME funds as well as activities funded with these funds. SCDH operates under the direct authority of the Mayor of Shelby County and will continue to be advised by the UCC. Shelby County Government will contract with the respective municipalities for all community development projects during the

program year and will directly administer and/or deliver those programs/projects associated with Housing Rehabilitation and Minor Home Repair. This structure will enable all municipalities and Shelby County to have direct control of these funds. The Mayor of Shelby County, representing the Entitlement Area as a whole, will have final approval of all expenditures.

During the 2015 Program Year, SCDH will continue to take advantage of upcoming training opportunities for staff directly involved in the delivery and administration of funds. SCDH will also provide training to the staff of its Urban County partners as requested in order to insure that participating municipalities are aware of their responsibilities under the entitlement programs.

### **Actions planned to enhance coordination between public and private housing and social service agencies**

In order to enhance coordination between public and private housing and social service agencies during the year, SCDH will continue to strengthen existing and seek out and solidify new partnerships with housing, health, and social service agencies that will enable Shelby County to make progress towards achieving the goals of the Consolidated Plan. Furthermore, the department will continue to work with local non-profits, CHDOs, and other agencies carrying out housing and community redevelopment efforts in order enhance overall coordination of activities at the local level.

### **Discussion**

In addition to these other described actions planned for the program year, SCDH intends to continue addressing impediments to fair housing identified in the Shelby County Analysis of Impediments to Fair Housing and also plans to continue efforts to provide outreach and training to Section 3 contractors.

## Program Specific Requirements

### AP-90 Program Specific Requirements – 91.220(l)(1,2,4)

#### Introduction

The total amount of program income that will have been received before the start of the next program year and that has not yet been reprogrammed was estimated based on an average of program income accrued to previous years as reported in the last three Consolidated Annual Performance Reports (CAPERs). SCDH will not be receiving any Section 108 loan proceeds, surplus funds from urban renewal settlements, grant funds returned to the line of credit for which the planned use has not been included in a prior statement or plan, or income from float-funded activities.

SCDH does not plan to expend funds on any Urgent Need activities. SCDH intends to use 100% of CDBG funds (subject to the low/mod benefit calculation) for activities that benefit persons of low- and moderate-income.

#### Community Development Block Grant Program (CDBG) Reference 24 CFR 91.220(l)(1)

Projects planned with all CDBG funds expected to be available during the year are identified in the Projects Table. The following identifies program income that is available for use that is included in projects to be carried out.

1. The total amount of program income that will have been received before the start of the next program year and that has not yet been reprogrammed	1,209
2. The amount of proceeds from section 108 loan guarantees that will be used during the year to address the priority needs and specific objectives identified in the grantee's strategic plan.	0
3. The amount of surplus funds from urban renewal settlements	0
4. The amount of any grant funds returned to the line of credit for which the planned use has not been included in a prior statement or plan	0
5. The amount of income from float-funded activities	0
<b>Total Program Income:</b>	<b>1,209</b>

#### Other CDBG Requirements

1. The amount of urgent need activities	0
2. The estimated percentage of CDBG funds that will be used for activities that benefit persons of low and moderate income. Overall Benefit - A consecutive period of one, two or three years may be used to determine that a minimum overall benefit of 70% of CDBG funds is used to benefit persons of low and moderate income. Specify the years covered that include this Annual Action Plan.	100.00%

**HOME Investment Partnership Program (HOME)**  
**Reference 24 CFR 91.220(l)(2)**

1. A description of other forms of investment being used beyond those identified in Section 92.205 is as follows:

No HOME funds will be used as forms of investment that are not described in Section 92.205. SCDH will leverage the use of HOME funds through its partnerships with CHDOs who will provide private sources of funding.

2. A description of the guidelines that will be used for resale or recapture of HOME funds when used for homebuyer activities as required in 92.254, is as follows:

When HOME funds are utilized for a homebuyer activity, contracts and restrictive covenants will ensure affordability of units acquired with HOME funds. Developers will be required to include a recapture provision in all agreements in order to ensure affordability. When new construction occurs using HOME funds, the affordability period will be determined as follows:

- 5 years when using less than \$15,000 in HOME funds,
- 10 years when using \$15,000 to \$40,000 in HOME funds, and
- 15 years when using more than \$40,000 in HOME funds.

If the property is resold or foreclosed upon during the designated period to a buyer who is not an eligible low-income purchaser, SCDH will recapture the original amount of HOME funds invested from net sales proceeds. However, if proceeds are insufficient to recapture the full HOME investment plus enable the homeowner a fair return of personal funds invested in the downpayment, principal payments, and capital improvements, SCDH may allow recaptured HOME funds to be reduced on a pro rata basis as provided in the HOME Final Rule, or subsequent HUD regulations. All HOME contracts and restrictive covenants contain safe harbor language approved by HUD.

Prior to the sale of a HOME-assisted unit to a first-time homebuyer, the developer must provide SCDH with documentation regarding applicant eligibility, evidence property will constitute their principal residence, and copies of deed provisions regarding resale of the property providing it will remain affordable for the designated period and providing for recapture of HOME funds by SCDH if the property is not sold to an eligible low-income buyer.

Fair return includes seller's payments which are long lasting in nature and add to the capital value of the property. These include additions, upgrades or modifications, and/or improvements that increase the size of the property or create a material addition. Such activities need to be documented by approved permits evidencing completed improvements or executed improvement contracts. Adding appliances such as garbage disposals, water heaters, cabinets, electrical repairs, landscaping, plumbing fixtures, carpets, painting, kitchen exhaust fans, shower doors, and tub

enclosures are not eligible for consideration. These guidelines are placed in agreements with developers who shall include references to the recapture guidelines in associated sales contracts, deeds of trust, mortgages, and deed restrictions.

- When the initial homebuyer sells the HOME assisted unit to a non-eligible family, the seller will be entitled to pay-off of first/second mortgages, recover investment (or downpayment), and documented capital improvements expenses in that order. If proceeds remain, SCDH shall recapture the pro rata share of HOME subsidy that remains on a straight-line declining basis.

- The sales price may not prevent a low-income family from purchasing the home. In each case, the following applies in order: the seller can pay-off a first/second mortgage, the seller must determine if he will lower the sales price to comply with HOME regulations governing resale to eligible low-income families or, should proceeds remain, the seller is entitled to recover out-of-pocket downpayment costs and documented capital improvements expenses. If proceeds remain, SCDH shall recapture the pro rata share of HOME subsidy that remains on a straight-line declining basis. The amount repaid shall be reduced by a pro rata fraction according to the anniversary of the closing date.

- If homeowner does not comply with the recapture option, has not made capital improvements, and seeks to sell the property at a price beyond the affordability of a low-income purchaser, the seller will be entitled to pay-off of first/second mortgages. Remaining proceeds may be recaptured by SCDH in an amount up to the full amount of the HOME subsidy assistance.

3. A description of the guidelines for resale or recapture that ensures the affordability of units acquired with HOME funds? See 24 CFR 92.254(a)(4) are as follows:

Units acquired with HOME funds are primarily associated with the CHDO program. In an effort to maintain the focus of the HOME Program, CHDOs shall include a provision in deeds of trust that ensures the housing unit assisted with HOME funds is maintained as an affordable housing unit for low-income families throughout the period of affordability. The deed of trust will need to have legal language in it that indicates whether the recapture or resale option was selected.

**Recapture:** The legal mechanism used to enforce the repayment of all or a portion of the direct HOME subsidy if the homeowner decides to sell the house within the affordability period. In selecting the recapture option the homeowner may sell the property to any willing buyer. The City requires full repayment of the direct HOME subsidy when resale occurs during the affordability period.

**Resale:** This option ensures that the HOME-assisted unit remains affordable over the entire affordability period. Therefore if the house is sold the new purchaser must be low-income in accordance with HOME regulations and the house must be the buyer's principle residence.

4. Plans for using HOME funds to refinance existing debt secured by multifamily housing that is rehabilitated with HOME funds along with a description of the refinancing guidelines required that will be used under 24 CFR 92.206(b), are as follows:
5. SCDH will not be using HOME funds to refinance existing debt secured by multifamily housing that is rehabilitated with HOME funds.

### **Discussion**

SCDH will continue to market programs in an effort to attract more minority contractors. Currently, in an effort to recruit maximum minority participation, SCDH encourages minority contractors to get their General Contractors License, advertises rehabilitation bids in the local newspaper, runs public notices soliciting contractors (especially MBEs and WBEs) to participate in rehabilitation programs, provides direct mailings for each bid package to contractors on the rehabilitation vendors list and continuously seeks other methods of recruiting minority general contractors who can bid on larger rehabilitation activities. SCDH also works with the Shelby County Equal Opportunity Compliance Office and the Purchasing Department to ensure that minority-and women-owned firms take advantage of Shelby County's Locally-Owned Small Business Program (LOSB). During the program year, SCDH will continue to enroll and assist MBEs and WBEs to become more competitive and successful in the local market.